

AFFIDAVIT

Jonathan Dunham, having been duly sworn, deposes and states:

1. I am a Postal Inspector employed by the U.S. Postal Inspection Service (USPIS) and assigned to the Boston Division. The Boston Division has responsibility for USPIS investigations in Massachusetts, New York, Vermont, Connecticut, New Hampshire, Maine, and Rhode Island. I have been employed by the Inspection Service since April 2017, and I am currently assigned to the Burlington, Vermont Domicile.

2. I am aware of facts that give me probable cause to believe that Andrew Morrison knowingly and intentionally possessed and attempted to possess heroin, a schedule I controlled substance, in violation of 21 U.S.C. §§ 844(a) and 846.

3. On June 4, 2020, I received from this Court a warrant to search Priority Mail parcel 9470 1368 9784 6721 4743 91 addressed to "Andrew Morrison, 35 Pearl Street, Essex Junction, VT 05452-3690." The parcel listed was searched, and found to contain 3.5 grams of a tan powder substance that field tested positive for heroin, which is a schedule I controlled substance.

4. Multiple parcels sent to Andrew Morrison at 35 Pearl Street were linked to a USPIS controlled substance investigation

in Houston, Texas. On February 28, 2020, I contacted Inspector Benjamin Whitsitt in the Houston, Texas division of USPIS. Inspector Whitsitt informed me that his investigation involved suspects' use of the U.S. mail system to ship heroin, methamphetamine, and crack cocaine to addresses throughout the United States. Based on my consultation with Inspector Whitsitt on June 4, 2020, I learned that as part of their investigation, USPIS executed a search warrant at a residence in Texas. USPIS recovered heroin, cocaine and methamphetamine during that search warrant. Investigators also recovered a ledger that listed Andrew Morrison as a purchaser of heroin, cocaine, and methamphetamine in October and November 2019. Inspector Whitsitt informed me that 35 Pearl Street, Essex Junction, VT regularly received shipments from the suspect(s) in his Texas investigation. Postal Service records indicated that 35 Pearl Street, Essex Junction, VT has received 93 parcels in the past year. Those records also indicated 42 of the 93 parcels originated from Texas.

5. On June 10, 2020, I received from this Court a warrant to search Priority Mail parcel 9470 1368 9784 6744 8036 11 addressed to "Andrew Morrison, 35 Pearl Street, Essex Junction, VT 05452 3690." The parcel was searched, and found to contain 2.5 grams of a tan powder substance that field tested positive

for heroin.

6. On August 18, 2020, Homeland Security Investigations (HSI) Special Agent Paul Altenburg and I performed a Knock and Talk at 35 Pearl Street. The purpose of the Knock and Talk was to interview Andrew Morrison regarding the shipments of controlled substances, and seek cooperation in the investigation. Andrew Morrison did not wish to cooperate. Andrew Morrison did not give consent to law enforcement to open the parcel referenced below.

7. On August 19, 2020, I received from this Court a warrant to search Priority Mail parcel 9470 1368 9784 6999 2376 74 addressed to "Andrew Morrison, 28 Vermont Ave, Colchester, VT 05446-3125." The parcel was searched, and found to contain 4.0 grams of a tan powder substance that field tested positive for heroin.

8. On November 17, 2020, I received an email from an Essex Junction post office employee. The employee stated the following: "the neighbors at 33 Pearl St Apt A and B are all of sudden receiving a large amount of express mail which they never used to receive. [REDACTED] said when [he/she] delivers the express packages to 33 Pearl A & B, there is always a guy outside in the yard and usually when [he/she] is leaving, the guy goes straight to mailbox but only takes the express packages

and never grabs the mail."

9. On November 23, 2020, I retrieved a priority mail parcel from my office mailbox. The parcel was addressed to "Kristin Miller/Jon Dunham", from "Postmaster Essex Junction, VT 05452-9998". I opened the parcel and discovered an open Priority Mail Express parcel, EJ 496 154 165 US addressed to "Wilhemenia Kirk, 33A Pearl St., Essex Junction, VT 05452" from "Tyler Reed 400 S Hall St, Dallas, TX 75226." The parcel had a note attached that read "Customer doesn't know sender. Suspicious contents white powder inside a pouch". I requested Inspector Kristin Miller be present during the remainder of the search. I discovered 3.5 grams of a light brown powdery substance consistent with heroin inside a small heat-sealed baggie. I cut open the baggie to field test the substance. The substance field tested positive for heroin. I sealed the baggie before placing it in an evidence bag.

10. On November 25, 2020, an employee at the Essex Junction post office informed me that they received the above-mentioned parcel on November 21, 2020 from an employee at the Pearl Street post office in Essex Junction, VT. The Pearl Street post office employee reported that a customer brought the opened parcel in and said they had no idea who it came from, but they found a white powdery substance inside.

11. On December 16, 2020, I was contacted by an employee at the Essex Junction, VT post office. The employee identified two parcels addressed to Wilhemenia Kirk, 33 Pearl St. Apt A, Essex Junction, VT 05452. The first Priority Mail parcel 9405 5368 9784 6415 2241 52 had a return address from "Barbie Johnson, 104-21 47th Ave, Corona, NY 11368". The second parcel 9374 8897 5600 9045 7173 08 was from "Amazon Fulfillment Services, 172 Trade Street, Lexington, KY 40511".

12. On December 16, 2020, I parked my undercover law enforcement vehicle at 32 Pearl Street, Essex Junction, VT 05452. I had a clear, and unobstructed view of 33, and 35 Pearl Street, Essex Junction, VT 05452. The purpose of the surveillance was to watch the carrier deliver the parcels. At 10:32 AM I used binoculars to watch Kate Morrison walk two dogs back to her residence, and enter 35 Pearl Street Apt. 2, Essex Junction, VT. I was able to clearly identify Kate Morrison based on photos of her. At 10:50 AM Andrew Morrison returned home, parked his red pickup truck in the driveway and entered 35 Pearl Street Apt 2, Essex Junction, VT. At 11:27 AM a United States Postal Service (USPS) carrier on a walking route, delivered the parcels, along with other mail, to the uppermost mail slot intended for Apartment A, attached to 33 Pearl Street, Essex Junction, VT 05452. The carrier then walked to 35 Pearl

Street Apt 2, Essex Junction, VT and delivered mail. At 11:30 AM Kate Morrison exited 35 Pearl Street Apt 2, Essex Junction, VT and walked to the mail slot attached to 33 Pearl Street Apt A, Essex Junction, VT. I saw Kate Morrison remove both parcels from the mail slot intended for 33 Pearl Street Apt A. Kate Morrison examined both parcels and placed the Amazon parcel back into the mail slot for 33 Pearl Street Apt A, Essex Junction, VT. Kate Morrison slipped Priority Mail parcel 9405 5368 9784 6415 2241 52 under her jacket and walked back to 35 Pearl Street Apt 2, Essex Junction, VT. The surveillance operation concluded after Kate Morrison entered 35 Pearl Street Apt 2, Essex Junction, VT with the Parcel addressed to "Wilhemenia Kirk, 33 Pearl St. Apt A, Essex Junction, VT 05452" from "Barbie Johnson, 104-21 47th Ave, Corona, NY 11368".

13. On January 5, 2021, I identified a Priority Mail Express parcel 9405 5368 9784 6415 2241 52 addressed to "Dustin Seguin, 33 Pearl St. Apt B, Essex Junction, VT 05452-4159" from "Chance Stinger, 1830 Peralta Way, Hanford, CA 93230". The Priority Mail Express parcel was located by employees at the Essex Junction, Vermont post office upon my request. The Subject Parcel was scheduled for delivery that same day.

14. On January 5, 2021, I parked my undercover law enforcement vehicle at 32 Pearl Street, Essex Junction, VT


05452. I had a clear, and unobstructed view of 33, and 35 Pearl Street, Essex Junction, VT 05452. The purpose of the surveillance was to watch the carrier deliver the parcel. At 9:47 AM I noticed a red Chevy Silverado truck with VT license plate 114A989 parked in the drive way. I witnessed Andrew Morrison driving the same truck on December 16, 2020, during a previous surveillance operation. At 9:59 AM I used binoculars to watch Kate Morrison walk out of 35 Pearl Street Apt. 2, Essex Junction, VT and collect the mail from the mail slot near her door. Kate Morrison then entered her residence and shut the door. At 10:18 AM a United States Postal Service (USPS) carrier on a walking route, delivered the parcel to the mail slot intended for Apartment B, attached to 33 Pearl Street, Essex Junction, VT 05452. The mail slot was second from the top slot. The carrier then walked to 35 Pearl Street Apt 2, Essex Junction, VT and delivered mail. At 10:19 AM Kate Morrison exited 35 Pearl Street Apt 2, Essex Junction, VT and walked to the mail slot attached to 33 Pearl Street Apt B, Essex Junction, VT. Kate Morrison removed the parcel intended for 33 Pearl Street Apt B. Kate Morrison carried the parcel back to 35 Pearl Street Apt 2, Essex Junction, VT. The surveillance operation concluded after Kate Morrison entered 35 Pearl Street Apt 2, Essex Junction, VT with the parcel addressed to "Dustin Seguin,

33 Pearl St. Apt B, Essex Junction, VT 05452-4159" from "Chance Stinger, 1830 Peralta Way, Hanford, CA 93230".

15. On February 2, 2021, I received from this Court a warrant to search Priority Mail parcel 9470 1368 9523 2590 4040 89 addressed to "KATE MORRISON, 35 PEARL ST, ESSEX JUNCTION VT 05452-3690." 35 Pearl Street, Essex Junction, VT 05452-3690, appeared to be associated with illegal shipments of controlled substances. The parcel was searched, and found to contain 2.5 grams of a tan powder substance that field tested positive for heroin.

16. On March 29, 2021, I received from this Court a warrant to search three parcels addressed to Andrew Morrison, 35 Pearl St., Essex Junction, VT 05452. Subject Parcel 1 was searched, and found to contain 13 white pills labeled "M" on one side and "30" on the reverse side, consistent with Oxycodone Hydrochloride 30mg. Also found in the parcel were 6 blue pills labeled "K9" consistent with Oxycodone Hydrochloride 30 mg. Subject Parcel 2 was searched, and found to contain 5 green pills labeled "OC" on one side and "80" on the reverse side, consistent with OxyContin 80mg. Subject Parcel 3 was searched, and found to contain 5.5 grams of a white powdery substance, which field tested positive for cocaine using a "Sirchie Nark Cocaine ID Swipe."

Dated at Burlington, in the District of Vermont, this 30th
day of March, 2021.



JONATHAN DUNHAM

Sworn to and subscribed before me this 30th day of March,
2021.



Notary Public
My Commission Expires 11/31/2023